

COUNTY OF SUFFOLK



STEVEN BELLONE
SUFFOLK COUNTY EXECUTIVE

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COUNTY ATTORNEY

DEPARTMENT OF LAW

September 10, 2015

Hon. A. Kathleen Tomlinson, U.S.M.J.
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *Watts, Lucente, Atkinson, Culoso and Andes v County of Suffolk, et al.*
Docket No.: 13-cv-1691

Hon. Magistrate Tomlinson:

On August 21, 2015 the Court issued an order regarding the exchange of Rehab Desk and Law Library log books from the Suffolk County Correctional Facility, after an in camera review of the documents by the Court. (Docket #28)

Pursuant to the Court's order, the County was to provide opposing counsel with copies of the Rehab Desk log books by September 4th, twenty-one days after the date of the order. The County has complied with that deadline.

The order provided that the County was to provide copies of the Law Library log books by this Friday, September 11th.

Although the County has been reviewing the Law Library log books and redacting same in a diligent manner, it is apparent that we will be unable to provide opposing counsel with the log books by September 11th. I was on vacation until September 1st and spent that week redacting the Rehab Desk log book pages. The Law Library log books, however, are comprised of over 1,600 pages and it is taking a significant amount of time to go through them.

Therefore, the County respectfully requests that the Court grant an additional seven days for the County to provide the Law Library log books to opposing counsel.

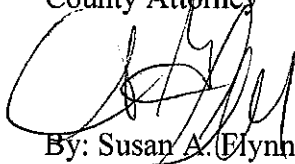
The plaintiffs' attorney and attorney for the co-defendant, Sgt. Joseph Foti, consent to this application.

The court is thanked for its courtesy and consideration.

Thank you.

Very truly yours,

Dennis M. Brown
County Attorney

A handwritten signature in black ink, appearing to read 'Susan A. Flynn', is written over the printed name.

By: Susan A. Flynn
Bureau Chief, State & Federal Torts Bureau

cc: Darnley D. Stewart
LaRusso and Conway